

JAP:RTP

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

12-63M

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)  
and 960)

ONNI BRITO,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

Tamika Comrie, being duly sworn, deposes and states that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about January 18, 2012, within the Eastern District of New York and elsewhere, the defendant ONNI BRITO did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for her belief are as follows:<sup>1/</sup>

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<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On January 18, 2012, defendant ONNI BRITO arrived at John F. Kennedy International Airport in Queens, New York, aboard JetBlue Airways flight 824 from Santo Domingo, Dominican Republic.

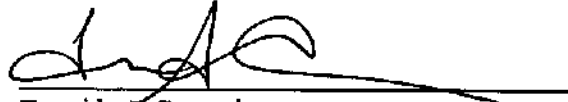
2. The defendant ONNI BRITO was selected by a Customs and Border Protection Officer ("CBPO") for a routine inspection. The CBPO asked the defendant if a black and red "Astor" bag bearing baggage claim tag number 5279909026 was his and whether all of the contents in the bag belonged to him. The defendant responded "yes" to both questions. The defendant possessed a claim tag bearing tag number 5279909026.

3. The CBPO noticed a strange odor coming from the bag. The defendant OMNI BRITO was escorted to a private search room. A probe of the defendant's bag revealed a brown powdery substance that field-tested positive for heroin. The defendant was then placed under arrest.

4. The defendant was read his Miranda warnings in the Spanish language, which he waived orally. The defendant then stated, in sum and substance, that he knew he was carrying drugs and that he was to be paid \$6,000.

5. The gross weight of the substance that field-tested positive for the presence of heroin is 3,830.0 grams.

WHEREFORE, your deponent respectfully requests that the defendant ONNI BRITO be dealt with according to law.



Tamika Comrie  
Special Agent  
HSI

Sworn to before me this  
19th day of January, 2012

UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK